

United States v. Dobbeleare, et al.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy To Distribute Methamphetamine)

1. Beginning in or about approximately September 2021, and continuing through in or about July 2022, the exact dates being unknown to the grand jury, in the State and District of Minnesota and elsewhere, the defendants,

**SCOTT CHRISTOPHER DOBBELAERE,
AARON RAYMOND DOMBOVY,
a/k/a "Bovy,"
MARSHALL MICHAEL GALBREATH,
a/k/a "Mav,"
EDWARD GARY KEARNS,
JERRY LEE MILLIKEN,
MERCEDES KAY MILLIKEN,
a/k/a "Sadie,"
LISA MARIE MUSOLF,
JAMES LEE NELSON,
a/k/a "Jim Bob,"
LISA CHRISTINE PHILLIPS, and
SAMUEL ORLO SCHAFFER,**

did knowingly and intentionally conspire with one another and others, known and unknown to the grand jury, to possess with the intent to distribute, and to distribute, a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

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QUANTITY OF METHAMPHETAMINE
INVOLVED IN THE CONSPIRACY

2. With respect to the defendants **SCOTT CHRISTOPHER DOBBELAERE, AARON RAYMOND DOMBOVY, MARSHALL MICHAEL GALBREATH, EDWARD GARY KEARNS, JERRY LEE MILLIKEN, MERCEDES KAY MILLIKEN, JAMES LEE NELSON, LISA CHRISTINE PHILLIPS, and SAMUEL ORLO SCHAFER**, their conduct as members of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(viii).

3. With respect to the defendant **LISA MARIE MUSOLF**, her conduct as a member of the conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count One, involved a quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

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FORFEITURE ALLEGATIONS

Count One of this Indictment is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures.

If convicted of Count One of this Indictment, the defendants,

**SCOTT CHRISTOPHER DOBBELAERE,
AARON RAYMOND DOMBOVY,
a/k/a "Bovy,"
MARSHALL MICHAEL GALBREATH,
a/k/a "Mav,"
EDWARD GARY KEARNS,
JERRY LEE MILLIKEN,
MERCEDES KAY MILLIKEN,
a/k/a "Sadie,"
LISA MARIE MUSOLF,
JAMES LEE NELSON,
a/k/a "Jim Bob,"
LISA CHRISTINE PHILLIPS, and
SAMUEL ORLO SCHAFFER,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violation, including but not limited to:

1. A 2007 Maroon Nissan Altima, Minnesota License Plate GRC746, Vehicle Identification Number 1N4BL21EX7C116567, used by LISA CHRISTINE PHILLIPS to transport methamphetamine and recover

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- proceeds on or about September 27, 2021;
2. A 2004 Gray BMW, Model 745, Minnesota License Plate DFF839, Vehicle Identification Number WBAGL635X4DP74042, registered to SCOTT CHRISTOPHER DOBBELAERE and used by SCOTT CHRISTOPHER DOBBELAERE to transport methamphetamine in October 2021;
 3. A 2006 Harley-Davidson, Model FLHXL, Minnesota License Plate 70428MG, Vehicle Identification Number 1HD1KBW196Y706628, used by MARSHALL MICHAEL GALBREATH to deliver methamphetamine on November 4, 2021;
 4. \$15,220 in U.S. Currency seized from DOBBELAERE on or about November 29, 2021;
 5. A 2012 White Chevrolet Tahoe, Minnesota License Plate DEV855, Vehicle Identification Number 1GNSK2E04CR305094; registered to JERRY LEE MILLIKEN and used by JERRY LEE MILLIKEN to deliver methamphetamine on December 15, 2021;
 6. A 2010 Black Harley-Davidson, Model FLHX, Minnesota License Plate 87804MG, Vehicle Identification Number 1HD1KB417AB642989, registered to JERRY LEE MILLIKEN and purchased with proceeds from controlled substance sales; and
 7. A 2020 Black Mazda CX-9, Minnesota License Plate EHN186, Vehicle

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Identification Number JM3TCBDY0L0406226, used to transport methamphetamine on or about November 26, 2021, and to transport firearms on or about February 24, 2022.

If any of the above-described property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON